

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA**

**CASE NO.: 1:24-cv-00779-JPH-MKK**

MAX MINDS, LLC,

Plaintiff,

v.

TRIANGLE EXPERIENCE GROUP, INC.,  
ROBERT EDWARD CLARE, JEFFREY  
MASE, KEVIN G MULLICAN and JOHN  
DOES 1-10,

Defendants.

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**PLAINTIFF’S MEMORANDUM IN SUPPORT OF ITS MOTION TO MAINTAIN  
DOCUMENT UNDER SEAL**

Plaintiff MAX MINDS, LLC (“Max”), by and through its undersigned counsel and pursuant to Local Rule 5-11(e), submits this Memorandum in Support of its Motion to Main Document Under Seal and states as follows:

1. Max filed its Motion for Modification or Clarification concerning the Magistrate Judge’s Order dated August 19, 2024 at ECF 74, with respect to defendant, Triangle Experience Group, Inc.’s (“TEG”) request for production number 6. (ECF 76).
2. In support of Max’s Motion, it filed the Declaration of Robert Simon (ECF 76-2).
3. On October 1, 2024, Max filed Exhibit 1 to the Declaration of Robert Simon under seal at ECF 85.
4. On August 28, 2024, this Court entered its Amended Stipulated Protective Order (ECF 75), which provides for the designation and handling of certain information as Highly Confidential – Attorneys’ Eyes Only.

5. The information contained in Exhibit 1 to the Declaration is competitively sensitive business information regarding Max's trade secrets, and warrants a heightened level of security. For this reason, it was marked as "HIGHLY CONFIDENTIAL (AEO) Discovery Material" as provided for in the parties protective order filed at ECF 75.

6. Redaction to Exhibit 1 will not afford adequate protection of the information, as Exhibit 1 to the Declaration of Robert Simon opines on the number of source code repositories Max has and their relevance to Max's Motion for Preliminary Injunction. Exhibit 1 lists all ninety-one (91) of Max's source code repositories, the name and location for each repository, a brief description of each repository, and other sensitive information which – if available to the public – could be harmful to Max.

7. For these reasons, Exhibit 1 should be kept sealed from the public despite its relevance or materiality to the resolution of the matter.

8. Counsel for Max emailed Counsel for TEG on October 1, 2024, asking if TEG objected to this Motion. As of the filing of this Motion, Counsel for TEG has not responded to Max's email.

Dated: October 1, 2024

Respectfully submitted,

/s/ J. Campbell Miller  
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*Counsel for Plaintiff Max Minds, LLC*